

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	
)	C.A. No. 17-10332-NMG
EDWARD J. ABELL, III)	
)	

**JOINT MOTION FOR RULE 11 HEARING AND
TO CANCEL STATUS CONFERENCE**

NOW COME the Parties, through counsel, and hereby move this Honorable Court to schedule a Rule 11 Hearing during the week of September 10, 2018, and to cancel the Status Conference in this case which is scheduled for August 16, 2018. In support thereof, counsel states the following:

1. Counsel for the Defendant has advised the Government that the Defendant will plead guilty to the present Indictment.
2. Counsel have conferred and are both available the week of September 10, 2018, for a Rule 11 Hearing.
3. The purpose of the status conference was to determine whether the Defendant was finished reviewing recent discovery so that he could decide whether to plea to the Indictment or proceed to trial.
4. The Defendant was not planning on attending the Status Conference on July 16, 2018, and has two family medical issues he is dealing with this

week which will make it difficult for him to attend a Rule 11 hearing this week.

WHEREFORE, this Honorable Court is respectfully urged to schedule a Rule 11 Hearing during the week of September 10, 2018 and cancel the Status Conference for a period of no more than 30 days.

Respectfully submitted,



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SEALED EXHIBIT